

16 Court St., Suite 2600
Brooklyn, NY 11241-1026

Invoice

Date	Invoice #
6/22/2015	1

Bill To
Carol Kulig

Serviced	Description	Hours	Rate	Amount
12/6/2012	Lengthy client intake.	2.5	375.00	937.50
6/5/2013	Contacted NCLC regarding possibly co-counseling class action suit. Organized proposal for co-counseling.	2.3	375.00	862.50
6/13/2013	Replied to questions from prospective class action co-counsel with NCLC.	1.3	375.00	487.50
6/14/2013	Responded to queries from prospective NCLC co-counsel regarding class issues. Clarification on potential size of size, precise nature of violation. Conference call with co-counsel regarding the same.	2.5	375.00	937.50
6/14/2013	Reviewed additional court files for additional violations.	2.1	375.00	787.50
6/20/2013	Worked on complaint.	7.7	375.00	2,887.50
6/21/2013	Revisions to proposed complaint.	1.6	375.00	600.00
6/24/2013	Client meeting. Updated her on status of case. Discussed complaint.	0.6	375.00	225.00
6/24/2013	Worked on revising complaint.	2.6	375.00	975.00
6/26/2013	Worked on revising class definition.	3	375.00	1,125.00
6/26/2013	Evaluated two additional named plaintiffs. Contacted co-counsel regarding the same.	2.2	375.00	825.00
6/26/2013	Reviewed proposed revisions to complaint of co-counsel. Made comments and circulated.	0.5	375.00	187.50
6/27/2013	Reviewed comments of co-counsel. Replied. Revisions to proposed complaint based on the same.	2.5	375.00	937.50
6/27/2013	Meeting with prospective named plaintiff, and preparation for the same.	4	375.00	1,500.00
7/6/2013	Made revisions to complaint based on recommendations of co-counsel.	4.5	375.00	1,687.50
7/7/2013	Evaluated claims of prospective named Plaintiff.	1.2	375.00	450.00
7/8/2013	Research of date of accrual of statute of limitations for breach of credit card agreement under Delaware state law.	4	375.00	1,500.00
7/8/2013	Call with prospective named Plaintiff.	1.1	375.00	412.50
7/8/2013	Met with another prospective named plaintiff.	0.7	375.00	262.50
		Total		
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7/8/2013	Final revisions to complaint and had filed.	3	375.00	1,125.00
7/9/2013	Per local rule forwarded file-stamped copy of complaint to clerk.	0.3	375.00	112.50
7/9/2013	Researched prior FDCPA decisions of district court judge, particularly decision denying Encore's motion to dismiss in a separate case.	1	375.00	375.00
7/10/2013	Research on disgorgement or forfeiture under GBL 349 and judiciary law.	1.3	375.00	487.50
7/30/2013	Call to opposing counsel regarding their request for an extension. Agreed to extension of the 30 days from today if they signed waiver of service for all defendants so there will be no objection as to service. Forwarded copy of the same to opposing counsel.	0.3	375.00	112.50
8/2/2013	Correspondence with opposing counsel regarding extension, waiver, conference call.	0.2	375.00	75.00
8/26/2013	Replied to co-counsel's comment regarding arbitration demand. Re-read the demand.	0.4	375.00	150.00
8/26/2013	Research on application of arbitration clause similar to the one at issue here to FDCPA claims.	1	375.00	375.00
8/26/2013	Reviewed their premotion letter to compel arbitration. Pulled and preliminary review of their main cases, and reviewed contra cases.	1	375.00	375.00
8/27/2013		0.3	375.00	112.50
8/30/2013	Call from opposing counsel asking to re-set hearing date. Indicated I was unopposed. Joint call to chambers. E-mail confirmation to opposing counsel.	0.2	375.00	75.00
9/5/2013	Rule 26(f) conference call and preparation for the same.	0.6	375.00	225.00
9/11/2013	Review of research on NY state assignment law.	0.9	375.00	337.50
9/12/2013	Pulled and reviewed cases on assignment and proof of assignment sufficient to compel arbitration.	4	375.00	1,500.00
9/13/2013	Went through their exhibits for deficiencies. Worked on response. Pulled more cases.	5	375.00	1,875.00
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9/17/2013	Reviewed cases suggested by outside counsel. Conference call regarding the same. Post call review of additional cases.	4	375.00	1,500.00
9/18/2013	Reviewed additional cases on provided by co-counsel.	0.3	375.00	112.50
9/19/2013		0.6	375.00	225.00
9/19/2013	Research on federal rules on business records evidence.	1.7	375.00	637.50
9/20/2013	Reviewed and responded to their proposed letter to the court. Compared with court's order regarding items to be covered in the joint letter. Responded to opposing counsels.	0.3	375.00	112.50
9/20/2013	Reviewed research of associate on business records. Went through research with associate. Directed additional research issues.	1	375.00	375.00
9/21/2013	Worked on opposition to motion to compel arbitration.	11	375.00	4,125.00
9/22/2013	Worked on opposition to motion to compel arbitration.	12.5	375.00	4,687.50
9/23/2013	Worked on opposition to motion to compel arbitration.	6.6	375.00	2,475.00
9/24/2013		2.2	375.00	825.00
9/25/2013	Completed opposition to motion to compel arbitration. Filed.	14	375.00	5,250.00
9/26/2013	Prepared for initial conference. Correspondence with opposing counsel regarding the same.	1.3	375.00	487.50
9/26/2013	Initial conference.	2	375.00	750.00
10/7/2013	Reviewed recent case on proof of cardholder agreement.	1	375.00	375.00
10/10/2013	Reviewed their Reply supporting motion to compel arbitration. Noted a few issues.	0.5	375.00	187.50
10/14/2013	Call from opposing counsel regarding possibility of an individual settlement.	0.1	375.00	37.50
10/17/2013	Reviewed correspondence from co-counsel with research regarding possible sur-reply issues. Replied with thoughts on how to proceed.	0.5	375.00	187.50
10/21/2013	Answered their 1st set of discovery.	0.5	375.00	187.50
10/23/2013	Reviewed and revised proposed sur-reply. Reviewed Midland's Reply and our moving papers.	5.9	375.00	2,212.50
10/24/2013	Revisions to sur-reply, particularly in light of new cases cited by Defendants in their supplemental declaration.	3.6	375.00	1,350.00
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10/25/2013	Revised sur-reply. Circulated. Call with co-counsel for 20 minutes regarding the same.	3	375.00	1,125.00
10/28/2013	Reviewed revisions sur-reply. Made revisions. Circulated. Filed. Requested oral argument.	2.3	375.00	862.50
10/29/2013	Reviewed notice from clerk to refile our motion for leave to file sur-reply under a different header.	0.2	375.00	75.00
11/5/2013	Reviewed new decision denying Midland Funding's request to compel arbitration, Hinton v. MF, issued October 22, 2013. Case was forwarded by co-counsel.	2	375.00	750.00
12/3/2013	Correspondence with co-counsel as to how to deal with their affirmative defense that there is tolling.	0.5	375.00	187.50
12/3/2013	Worked on letter motion to compel.	0.3	375.00	112.50
12/17/2013	Conference call with co-counsel regarding tolling strategy.	1.3	150.00	195.00
1/9/2014	Reviewed their proposed letter to court for status conference. Reviewed individual practices and scheduling order for any additional issues that should be reviewed.	0.7	375.00	262.50
1/15/2014	Reviewed lengthy letter from opposing counsel making arguments against our claims and making a demand for a settlement offer. Call with opposing counsel discussing the same.	0.7	375.00	262.50
1/15/2014	Correspondence to opposing counsel regarding joint scheduling order and protective order. Drafted proposed protective order and circulated. Circulated authority to opposing counsel as to the burden on maintaining a document as confidential always being on the designating party.	1.7	375.00	637.50
1/16/2014	Initial conference. Pre-conference meeting with opposing counsel. Includes 30 minutes of travel time to and from office to court.	2	375.00	750.00
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Serviced	Description	Hours	Rate	Amount
1/16/2014	Correspondence to opposing counsel with the protective order Midland agreed to last year in the SD NY in Khan v. Midland. Ask them to agree to essentially the same. Drafted and submitted the proposed protective order into our style. Forwarded them the document production answer in Khan where they agreed to produce the insurance policy declaration sheet and did not request a confidentiality agreement regarding the same.	0.3	375.00	112.50
1/16/2014	Drafted list of information we need to settlement.	0.4	375.00	150.00
1/16/2014	Reviewed signed scheduling order. Entered deadlines and ticklers.	0.5	375.00	187.50
1/16/2014	Conversation with co-counsel regarding settlement and case strategy after our discussion with opposing counsel today.	1.3	375.00	487.50
1/17/2014	Correspondence to opposing counsel to itemize items needed for informal discovery.	0.4	375.00	150.00
1/30/2014	Reviewed their proposed protective order. Noted concerns. Reviewed model protective orders by other SD NY judges. Forwarded to co-counsel for review and comment.	1.1	375.00	412.50
1/30/2014	Worked on initial disclosures. Forwarded to co-counsel for review and comment. Served.	0.6	375.00	225.00
2/4/2014	Correspondence with opposing counsel regarding their individual offer of settlement and the status of the informal discovery answers.	0.1	375.00	37.50
2/4/2014	Call to client to update her on status of case, to relay their offer of settlement. Discussed the offer of settlement in detail. Answered any questions she might have. She instructed me to rejected the offer. Relayed the same to opposing counsel.	0.5	375.00	187.50
2/10/2014	Call with Timothy St. George, opposing counsel, regarding informal discovery exchange.	0.1	375.00	37.50
2/10/2014	Researched and found other protective orders agreed to by Midland that were more narrowly tailored than the one they are suggesting now.	0.5	375.00	187.50
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2/10/2014	Correspondence with opposing counsels regarding proposed protective order and informal discovery in aid of settlement.	0.3	375.00	112.50
2/13/2014	Call with opposing counsel regarding their expected numbers as to class size, and their assumptions in determining the number. Discussed merits of the assumptions.	0.4	375.00	150.00
2/13/2014	Contacted co-counsel regarding Defendants' new position as to information they are willing to provide at this point.	0.7	375.00	262.50
2/18/2014	Began drafting first set of discovery requests. Forwarded draft to co-counsel for review and comment. Made changes. Served requests.	2.1	375.00	787.50
2/19/2014	Correspondence with opposing counsel regarding status of their answers to our "informal" discovery requests in aid of settlement discussion.	0.1	375.00	37.50
2/19/2014	Correspondence with co-counsel as to how to approach settlement discussions as to staying formal discovery pending "informal" discovery requests.	0.3	375.00	112.50
2/27/2014	Returned call to opposing counsel regarding informal discovery on class size and class damages.	0.2	375.00	75.00
3/4/2014	Continued working on second set of discovery.	0.5	375.00	187.50
3/6/2014	Call with opposing counsel Timothy St. George regarding settlement, information needed in order to have settlement offers (e.g. class size as each of us see it, damages as each of us sees it), and extending discovery deadlines in aid of the same.	0.2	375.00	75.00
3/10/2014	Research on whether res judicata bars claims of class members against whom judgments had been rendered.	3	375.00	1,125.00
3/10/2014	Worked on discovery requests.	2	375.00	750.00
3/11/2014	Completed draft of 3rd set of discovery. Circulated to opposing counsel for review and revisions.	3	375.00	1,125.00
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3/11/2014	Call with opposing counsel regarding discovery, obtaining information informally, extension of time in order to discuss settlement.	0.3	375.00	112.50
3/12/2014	Revisions to draft of discovery given proposed changes of co-counsel.	0.3	375.00	112.50
3/13/2014	Call with co-counsel regarding discovery, settlement information.	0.7	375.00	262.50
3/13/2014	Made revisions to discovery requests based on call with co-counsel and circulated.	0.5	375.00	187.50
3/17/2014	Calls with co-counsel regarding number of class numbers in each subclass.	0.3	375.00	112.50
3/18/2014	Lengthy call with opposing counsel regarding settlement and disclosure of class size and damages in aid of the same.	0.4	375.00	150.00
3/18/2014	Final revisions to discovery; served.	0.5	375.00	187.50
3/18/2014	Correspondence to co-counsel regarding call with Midland.	0.5	375.00	187.50
3/19/2014	Drafted supplemental discovery request as to class size for partial payments. Served.	0.3	375.00	112.50
3/25/2014	Call to opposing counsel regarding settlement and discovery. Left message.	0.1	375.00	37.50
3/28/2014	Call to opposing counsel regarding settlement. They indicated they have together all the information we requested. Counsel was waiting for authority from client as to whether to produce all of the information requested. He will speak with client in the next 1 - 2 business days and then call me, with follow up letter by him.	0.1	375.00	37.50
4/2/2014	Call with opposing counsel regarding numbers for settlement.	0.3	375.00	112.50
4/2/2014	Typed analysis numerously and damages numbers from opposing counsel. Correspondence to co-counsel regarding the same.	2.5	375.00	937.50
4/2/2014	Call with co-counsel regarding settlement approach given numbers provided by opposing counsel.	0.9	375.00	337.50
4/18/2014	Research effect of partial payment in restarting SOL under Delaware law.	1.6	375.00	600.00
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4/21/2014	Research on issue of partial payment restarting the SOL under Delaware law.	6.2	375.00	2,325.00
4/22/2014	Continued research on whether partial payment tolls SOL under Delaware law.	1	375.00	375.00
4/22/2014	Research on Delaware SOL tolling and res judicata bar on FDCPA claims based on collection suit being time barred.	3.5	375.00	1,312.50
4/24/2014	Review of numbers for settlement purposes.	0.6	375.00	225.00
4/24/2014	Conference call with co-counsel as to a settlement demand.	0.5	375.00	187.50
4/24/2014	Follow up correspondence with co-counsel	0.5	375.00	187.50
4/24/2014	Call with opposing counsel regarding settlement and preparation for the same.	0.9	375.00	337.50
4/29/2014	Correspondence with opposing counsel regarding settlement and discovery parameters.	0.1	375.00	37.50
4/30/2014	Call to opposing counsel regarding discovery as to Encore being vicariously liable, and preparation for the same.	0.3	375.00	112.50
5/9/2014	Correspondence with opposing counsel regarding discovery deadlines and hearing deadlines. Reviewed scheduling order. Call to opposing counsel.	0.5	375.00	187.50
5/9/2014	Drafted and served 5th set of discovery (regarding tolling of SOL).	0.5	375.00	187.50
5/12/2014	Preparation for call with opposing counsel regarding settlement and discovery.	0.5	375.00	187.50
5/12/2014	Call with opposing counsel regarding settlement and discovery.	0.7	375.00	262.50
5/21/2014	Updated co-counsel on status of settlement discussions.	0.7	375.00	262.50
5/22/2014	Preparation for call with opposing counsel. Call with opposing counsel regarding settlement. Email to Charles with results. Reviewed order from court denying our request to enlarge deadline to complete discovery. Correspondence to opposing counsel to require discovery answers to be served within 2 weeks.	1.5	375.00	562.50
5/22/2014	Call with co-counsel regarding strategy with proceeding.	0.4	375.00	150.00
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5/22/2014	Call with opposing counsel regarding scheduling given order by the court denying extension.	0.5	375.00	187.50
5/23/2014	Negotiation with opposing counsel regarding stipulation and discovery. Calls and emails. Drafted and revised proposed stipulation language as to joint liability of defendants.	1	375.00	375.00
5/28/2014	Reviewed and revised proposed stipulation as to joint statutory damages.	0.5	375.00	187.50
5/28/2014	Worked on revised stipulation that can consider Encore's net worth, and circulated. Correspondence with opposing counsel regarding the same. Proposed alternative agreement.	1.4	375.00	525.00
5/28/2014	Worked on revised proposed protective order and circulated.	0.8	375.00	300.00
5/29/2014	Replied to e-mail from opposing counsel regarding stipulation.	0.5	375.00	187.50
5/30/2014	Call to opposing counsel Kevin Wallace regarding protective order.	0.1	375.00	37.50
5/30/2014	Reviewed e-mail from opposing counsel asking for revisions to stipulation. Reviewed their answer to see which elements the admitted. Correspondence to opposing counsel regarding deadline to respond to discovery, to set depositions.	0.8	375.00	300.00
6/3/2014	Call with opposing counsel Kevin Wallace regarding protective order. He wanted changes to allow protective to allow them to designate any item as confidential if it is disclosed as part of settlement discussions, even if it does not otherwise meet the good cause standard.	0.4	375.00	150.00
6/4/2014	Correspondence with opposing counsel regarding agreed protective order. Signed. Returned.	0.1	375.00	37.50
6/4/2014	Returned call to opposing counsel Timothy St. George. Lengthy call regarding discovery, their request for an additional extension on discovery, stipulation regarding Encore joint liability for net worth. Discussion regarding Encore liability.	1	375.00	375.00
6/5/2014	Revised proposed stipulation based on prior conversation with opposing counsel and circulated.	0.4	375.00	150.00
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6/5/2014	Worked on letter for pre-motion conference to file motion for class certification.	1.3	375.00	487.50
6/6/2014	Correspondence with co-counsel updating him on case. Asked for his views on stipulation, dismissal of	0.8	375.00	300.00
6/6/2014	Responded to letter for extension on discovery.	3.9	375.00	1,462.50
6/9/2014	Correspondence with opposing counsel regarding strategy in stipulation with Encore, discovery.	0.4	375.00	150.00
6/10/2014	Proposed revised stipulation language on Encore.	0.2	375.00	75.00
6/12/2014	Worked on letter for pre-motion conference to file motion for class certification.	0.7	375.00	262.50
6/13/2014	Worked on revisions to class certification letter based on proposed changes of co-counsel.	0.4	375.00	150.00
6/17/2014	Call with opposing counsel regarding settlement.	0.3	375.00	112.50
6/17/2014	Correspondence to co-counsel regarding settlement, their indication that they will be filing a letter to strike the class definition.	0.5	375.00	187.50
6/17/2014	Filed letter for pre-motion conference to file for class certification.	0.2	375.00	75.00
6/17/2014	Answered Defendants' 2nd set of discovery requests and served.	2.5	375.00	937.50
6/17/2014	Preliminary review answers to their answers to our discovery requests.	0.8	375.00	300.00
6/18/2014	Conference call with co-counsel regarding settlement strategy, went through their settlement offer terms, worked on putting together an alternative settlement package. Went through response to their motion to strike class allegations.	1.8	375.00	675.00
6/19/2014	Prepared for call with opposing counsel regarding discovery. Went through their discovery responses. Created punch list of issues.	1	375.00	375.00
6/19/2014	Lengthy call regarding discovery with opposing counsel. Went line by line through discovery answers. Discussed stipulation as to Encore to dismiss them and limit discovery. Discuss issues of deposition dates.	1.6	375.00	600.00
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6/19/2014	Updated co-counsel on status of settlement discussions, and obtained consensus on how to deal with dismissing Encore.	0.3	375.00	112.50
6/19/2014	Worked on DWQ and subpoena as to Einstein and other law firms.	2.1	375.00	787.50
6/19/2014	Worked on document production.	1	375.00	375.00
6/20/2014	Worked on motion to compel.	2.3	375.00	862.50
6/23/2014	Continued working on motion to compel.	6.3	375.00	2,362.50
6/24/2014	Correspondence with opposing counsels regarding depositions.	0.4	375.00	150.00
6/24/2014	Correspondence with co-counsel regarding deposition strategy, questions. Telephone call regarding the same.	0.8	375.00	300.00
6/24/2014	Revised deposition notice.	0.5	375.00	187.50
6/24/2014	Prepared for depositions of Midland corporate defendants for tomorrow (in response to Defendants wanting their corporate representative sit in on the deposition of Amanda Perez and Crystal Scott.	6	375.00	2,250.00
6/24/2014	Worked out agreement with opposing counsel as to depositions of Defendants, deposition topics, stipulation as to consideration of Encore's net worth for other Defendants statutory damages. Re-noticed depositions.	0.5	375.00	187.50
6/24/2014	Prepared for deposition of Amanda Perez and Crystal Scott. Worked on outline of questions for them.	5.7	375.00	2,137.50
6/25/2014	Depositions of Defendant Amanda Perez and witness Crystal Scott, and morning of preparations for the same, revisions to outline of questions.	9	375.00	3,375.00
6/26/2014	Depositions of corporate representative for Encore, MCM, and MF. Early morning final preparations for the same, including completion of deposition question outline.	11	375.00	4,125.00
6/27/2014	Typed outline of outstanding issues and roadmap for balance of discovery phase based on deposition testimony.	1.4	375.00	525.00
6/30/2014	Completed motion to compel letter given additional deficiencies in deposition, and filed.	7.6	375.00	2,850.00
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7/1/2014	Correspondence with opposing counsel.	0.3	375.00	112.50
7/1/2014	Replied to correspondence from opposing counsel regarding discovery, settlement, deposition of Plaintiff.	0.7	375.00	262.50
7/1/2014	Reviewed correspondence from opposing counsels regarding updating our discovery answers and deposition dates for Kulig. Reviewed responses. Called client. Replied to opposing counsels.	1	375.00	375.00
7/1/2014	Reviewed outline issues for deposition of named plaintiff in NCLC class action treatise.	0.9	375.00	337.50
7/1/2014	Letter to client regarding deposition date and time.	0.4	375.00	150.00
7/2/2014	Worked on motion for class certification.	2	375.00	750.00
7/2/2014	Reviewed order of court on discovery issues. Contacted opposing counsel regarding the same to set up date.	0.4	375.00	150.00
7/7/2014	Continued working on motion for class certification, and research regarding the same (in particular, cases certifying class actions based on the filing of time barred collection lawsuits).	6	375.00	2,250.00
7/8/2014	Reviewed and served Chase answers to our DWQ.	0.3	375.00	112.50
7/8/2014	Continued working on motion for class certification.	7.8	375.00	2,925.00
7/9/2014	Continued working on class certification.	0.3	375.00	112.50
7/9/2014	Worked on additional discovery requests.	0.5	375.00	187.50
7/10/2014	Reviewed objections to our DWQ and document subpoena by Forster and Garbus. Called their counsel and left message to discuss.	0.2	375.00	75.00
7/10/2014	Meeting with opposing counsels regarding discovery.	2.9	375.00	1,087.50
7/11/2014	Completed motion to certify class. Filed.	15	375.00	5,625.00
7/11/2014	Call with counsel for Forster & Garbus regarding their compliance with our subpoena.	0.4	375.00	150.00
7/11/2014	Correspondence with opposing counsels regarding attempting to set up last minute mediation. Contacted mediators. No agreement reached.	0.4	375.00	150.00
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7/14/2014	Client meeting in preparation for deposition, and preparation for the same.	4.5	375.00	1,687.50
7/15/2014	Deposition of Plaintiff, and morning of preparation for the same. Post deposition meeting with client.	8.8	375.00	3,300.00
7/15/2014	Reviewed ECF notice to re-file entire document. Revised. Filed.	0.4	375.00	150.00
7/16/2014	Follow up with opposing counsels regarding outstanding discovery issues. Lengthy correspondence to opposing counsel with itemization of issues.	0.8	375.00	300.00
7/17/2014	Review of additional information provided by opposing counsel. Replied regarding the same.	0.4	375.00	150.00
7/18/2014	Reviewed list of putative original creditors provided by Midland. Checked states of principal place of business, main office as listed in articles of association.	0.8	375.00	300.00
7/18/2014	Reviewed letters of counsels for law firms objecting to subpoenas.	0.4	375.00	150.00
7/18/2014	Drafted additional discovery to Midland and served.	3	375.00	1,125.00
7/21/2014	Call with attorney for Cohen & Slamowitz. They will not provide any additional information until the motion to compel issues with Midland are resolved. Follow up email confirming the same.	0.4	375.00	150.00
7/21/2014	Correspondence to counsel for Forster & Garbus regarding compliance with subpoena.	0.1	375.00	37.50
7/21/2014	Worked on our section of joint discovery letter.	0.3	375.00	112.50
7/21/2014	Worked on revisions to proposed joint discovery letter.	4.2	375.00	1,575.00
7/22/2014	Continued working on proposed joint letter.	10.5	375.00	3,937.50
7/22/2014	Drafted unopposed letter for adjusting briefing schedule for class certification briefing.	0.4	375.00	150.00
7/23/2014	Continued working on joint letter. Circulated revised draft.	3	375.00	1,125.00
7/23/2014	Filed letter for enlargement of time given consent of opposing counsel.	0.3	375.00	112.50
7/24/2014	Reviewed and revised proposed joint letter submitted by opposing counsels. Exchanged additional revisions. Filed.	10	375.00	3,750.00
		Total		
		Payments/Credits		
		Balance Due		

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Bill To
Carol Kulig

Serviced	Description	Hours	Rate	Amount
7/29/2014	Worked on additional discovery requests.	1.2	375.00	450.00
7/29/2014	Reviewed order on joint discovery letter.	0.4	375.00	150.00
7/29/2014	Reviewed their opposition to class certification. Began outlining response.	9	375.00	3,375.00
7/30/2014	Wrote letter seeking to allow us to either file under seal the portions of the deposition and exhibits for our response to their discovery letter, or, alternatively, to remove the confidentiality designation. Circulated for consent to at least seal the provisions. Filed.	1.3	375.00	487.50
8/13/2014	Correspondence to co-counsel asking about information for response in opposition to class certification.	0.6	375.00	225.00
8/14/2014	Responded to inquiries from co-counsel regarding specific items for our reply in support of class certification and response in opposition to their motion to strike class definition.	0.5	375.00	187.50
8/14/2014	Drafted of letter to remove confidentiality designations in light of Court's order denying request to file under seal.	3.5	375.00	1,312.50
8/15/2014	Call from Chambers regarding confidentiality designations.	0.2	375.00	75.00
8/15/2014	Call with co-counsel regarding response to their motion.	0.1	375.00	37.50
8/15/2014	Worked on section of the brief.	6.9	375.00	2,587.50
8/16/2014	Continued working on reply in support of our motion for class certification and opposition to their motion to strike class definitions.	8	375.00	3,000.00
8/17/2014	Continued working on reply in support of our motion for class certification and opposition to their motion to strike class definitions.	14	375.00	5,250.00
8/18/2014	Completed working on reply in support of our motion for class certification and opposition to their motion to strike class definitions. Filed.	16	375.00	6,000.00
8/19/2014	Follow up correspondence with co-counsel and opposing counsel regarding settlement discussions, discovery cut off.	2.2	375.00	825.00
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8/27/2014	Reviewed order of court confirming close of fact discovery date. Reviewed prior order and last set of discovery requests to determine what we might need for summary judgment, trial, that is not covered by the order.	0.5	375.00	187.50
8/27/2014	Emails with opposing counsel regarding mediation and outstanding discovery issues.	0.6	375.00	225.00
8/28/2014	Call with opposing counsel regarding mediation, discovery.	0.8	375.00	300.00
8/28/2014	Worked on proposed joint letter regarding discovery.	0.8	375.00	300.00
8/29/2014	Correspondence with co-counsel regarding setting up mediation, terms and dates.	0.3	375.00	112.50
8/29/2014	Additional research on arbitrators. Calls to check on availability of JAMS mediators. Correspondence regarding the same.	1	375.00	375.00
8/29/2014	Drafted motion to compel documents disclosed in deposition.	2.4	375.00	900.00
9/2/2014	Call to opposing counsel regarding mediation.	0.3	375.00	112.50
9/3/2014	Worked on arranging a mediator. Calls and emails regarding the same.	0.7	375.00	262.50
9/3/2014	Call with co-counsel regarding filing letter seeking pre-motion conference to file summary judgment, and regarding mediation.	0.7	375.00	262.50
9/8/2014	Phone conference with mediator	1.5	375.00	562.50
9/9/2014	Reviewed their spreadsheet data for numbers of class members that meet certain criteria.	0.3	375.00	112.50
9/9/2014	Reviewed deposition transcript in response to their partial disclosure.	0.5	375.00	187.50
9/9/2014	Call with co-counsel regarding mediation, approach, settlement ranges, what to include in our settlement letter.	1.4	375.00	525.00
9/10/2014	Reviewed their data from new spreadsheet on damages. Call to opposing counsel regarding numbers.	2.3	375.00	862.50
9/12/2014	Worked on class damage calculations. Added damage section to mediation statement to mediator.	11.3	375.00	4,237.50
		Total		
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9/14/2014	Worked on damage analysis. Conferred with expert on various damage model assumptions given proxies for dates of service. Research on judiciary law damages as penalties so that can get both penalty under judiciary law and actual damage under a difference statute.	3	375.00	1,125.00
9/14/2014	Conference call with opposing counsel regarding settlement conference, damage range.	1	375.00	375.00
9/15/2014	Conference call with co-counsel regarding settlement.	1.4	375.00	525.00
9/15/2014	Revised data provided to mediator.	1.7	375.00	637.50
9/15/2014	Call with mediator.	1	375.00	375.00
9/15/2014	Continued working on judiciary law research. Other preparation for mediation.	6	375.00	2,250.00
9/16/2014	Mediation and preparation for the same.	10	375.00	3,750.00
9/16/2014	Correspondence and calls regarding possibilities of issuance of 1099 for class members where there is a dismissal with prejudice.	1	375.00	375.00
9/18/2014	Call with Charles as to how to deal with issue of 1099 in vacating	0.6	375.00	225.00
9/18/2014	Call with mediator regarding settlement.	0.6	375.00	225.00
9/23/2014	Worked on response to their selective quotations of transcript, and filed.	2.5	375.00	937.50
9/26/2014	Call from mediator regarding settlement, discussion of their latest offer of settlement. Called co-counsel to discuss, strategy on how to respond.	0.8	375.00	300.00
9/29/2014	Reviewed order denying class certification. Conferred with co-counsel in how to proceed.	0.9	375.00	337.50
10/2/2014	Client meeting.	2.3	375.00	862.50
	SUBTOTAL OF FEES FOR THE TIME OF THE ATTORNEY.			181,845.00
		Total	\$181,845.00	
		Payments/Credits	\$0.00	
		Balance Due	\$181,845.00	